

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

Plaintiff,

As representative of

THE COMMONWEALTH OF PUERTO
RICO, *et al.*,

Debtor ¹

Civil. No.: 17-BK-3283-LTS

PROMESA

TITLE III

**OPPOSITION TO THE FIFTY-SIXTH OMNIBUS OBJECTION (NON-SUBSTANTIVE)
OF THE COMMONWEALTH OF PUERTO RICO TO DUPLICATE BOND CLAIMS
[ECF NO. 7286]**

TO THE HONORABLE COURT:

COMES NOW the creditor, **Cooperativa de Ahorro y Crédito de Empleados de la Autoridad de Energía Eléctrica (“CoopAEE”)**, through the undersigned counsels and respectfully responds in opposition to the Fifty Sixth Omnibus Objection (Non-Substantive) of the Commonwealth Of Puerto Rico To Duplicate Bonds Claims [ECF No. 7286] “the Objection”), and states and prays as follows:

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

1. The Commonwealth of Puerto Rico (“Debtor”) has objected to one of CoopAEE’s timely filed proof of claim as duplicative.
2. The appearing party claim 24609 (Objection No. 42) is included in the objection.
3. CoopAEE objects the position of the Debtor under the following grounds:
 - a. Claim No. 24609, Objection No. 42: there is not a duplicative of one or more master proof of claim filed. According to our records, the proof of claim was not subsequently amended or superseded by a new proof of claim. As a matter of fact, the Prime Clerk System shows only one claim registered, the above-mentioned claim no. 24609, which was filed on May 25th, 2018, for the amount of \$53,821.53.
4. CoopAEE does not object to the non-substantive disallowance of the duplicative claims it filed against the Commonwealth, contingent on a finding that each of the remaining claims is prima facie valid, pursuant to 11 U.S.C. 502 (a). Given that the above-mentioned claim is the only one that exists under that number, it cannot be considered as a duplicative claim and the Creditor respectfully request to this Honorable Court, that for the reasons stated above, do not disallow the claim No. 24609.

Certificate of service: I hereby certify that on this date I electronically filed the above document with the Clerk of the Court using the CM/ECF System which sends notification of such filing to all those who in this case have registered for receipt of notice by electronic mail and parties in interest that have filed notices of appearance.

RESPECTFULLY SUBMITTED.

In Bayamón, Puerto Rico, for San Juan, Puerto Rico this 1st day of July, 2019.

CIVIL NO. 17-BK-3283-LTS
Page 3

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